

EXHIBIT A

Proposed Order

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et
al.*,

Debtors.²³

PROMESA
Title III

No. 17 BK 3283-LTS (Jointly
Administered)

**ORDER GRANTING OFFICIAL COMMITTEE OF UNSECURED CREDITORS'
URGENT MOTION TO COMPEL DISCLOSURE STATEMENT DISCOVERY FROM
OVERSIGHT BOARD AND AAFAF**

The Court, having considered the *Official Committee Of Unsecured Creditors' Urgent Motion To Compel Disclosure Statement Discovery From Oversight Board and AAFAF* (the “Motion to Compel”), and the Court determining that (i) the Court has subject matter jurisdiction over the Motion to Compel pursuant to 48 U.S.C. § 2166(a); (ii) venue of this proceeding and the Motion to Compel is proper under 48 U.S.C. § 2167(a); (iii) notice of the Motion to Compel was adequate and proper under the circumstances and that no further or other notice need be given; and (iv) good cause appearing therefor, it is hereby ORDERED, ADJUDGED AND DECREED

THAT:

²³ The Debtors in these jointly-administered Title III cases, along with each Debtor's respective Title III case number (listed as a bankruptcy case number due to software limitations) and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (iv) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801).

1. The Motion to Compel is GRANTED as set forth herein.
2. It is hereby ORDERED that the Oversight Board (including all of its advisors) produce the documents requested in the Committee's document requests.
3. It is hereby ORDERED that AAFAF produce the documents requested in the Committee's document requests.
4. It is hereby ORDERED that the Oversight Board appear for a deposition under Federal Rule of Civil Procedure 30(b)(6).
5. It is hereby ORDERED that the following individuals appear for fact depositions: (1) David Skeel, (2) Justin Peterson.
6. It is hereby ORDERED that all documents be produced by no later than June 10, 2021, and all depositions occur by no later than June 14, 2021.
7. The Court retains subject matter jurisdiction to hear and determine all matters arising from the implementation of this Order.

Dated: May ___, 2021

JUDITH GAIL DEIN
UNITED STATES MAGISTRATE JUDGE